

Hi, everyone. I think we agreed at Tuesday's meeting that next Tuesday, January 19th, would be too soon to hold another stakeholder meeting. We need to do a little more research, answer some questions and let the latest ideas simmer for a bit.

The 3rd Stakeholder Meeting has been rescheduled to **Wednesday, January 27th in the 3rd floor conference room of the Wallace Building from 1:00 to 3:00 PM.** Please remove the January 19th meeting date from your calendars and schedule the January 27th meeting date.

We presented the new federal UST regulations and the Iowa revisions to the PMCI Board Wednesday, January 13th. It was another productive meeting in that we had a lot of questions and feedback. Based on these three meetings, this is what we have heard and learned:

1. *It would be a challenge for owners/operators to meet the testing and inspection requirements of the federal deadline, which is October 13, 2018.*
We can look at this in more depth at our next stakeholder meeting.
2. *How many lined tanks potentially could be affected by the 10% requirement? Where does 10% come from?*
These are tanks that do not have external corrosion protection but rely on internal lining alone to satisfy the corrosion protection requirements. We are looking into options for these tanks.
3. *Moving what is now the April 1st date up to February 15th before being late for the tank management fee is too early.*
Remember, we wanted to move up this date to avoid the last minute rush of applications, which unnecessarily stretches out the tag application process by another month. We can discuss a later date at the next meeting, but consider March 1st.
4. *Class C operators turn over quickly for DNR and owner tracking.*
We are pretty certain we don't want to track Class C Operators. As and Bs are already tracked during the tag renewal process. We still need to be notified whenever there has been a change to the Class A/B operator as these change before and after tag renewals.
5. *Retraining Class A/B Operators every year is excessive.*
We will propose a three year retraining cycle for the Class A/B Operators with the possibility of retraining when the UST system is out of compliance (e.g., compliance issues identified under the delivery prohibition process [135.3(8)]). We uphold the proposed annual training for Class C is still necessary.
6. *Who will conduct the monthly and annual walkthroughs?*
We plan to discuss this further at the next stakeholder meeting.
7. *"Multiple groundwater monitoring wells may be required for closure." The term "Multiple" is too vague.*
Owners/operators would like this better explained. Perhaps to state: "At some tank and piping closures, a minimum of one monitoring well may not be sufficient to represent a release where it is most likely to be present. An additional groundwater monitoring well or wells may be necessary."
8. *Why a 3-6 month inspection for new facility when monthly and annual walkthrough is required. It is an additional unnecessary expense to owner.*
While the department still sees the benefit of a compliance inspection within 3 to 6 months after installation, we realize that the monthly and annual walkthroughs should identify any unusual operating conditions after the third and final installation inspection has been completed. The three required Installation inspections are necessary and vital to ensuring the system is built to specs and standards and will operate safely. The department does not want to eliminate an installation inspection for the sake of a 3-6 month compliance inspection. Also, the secondary containment requirement should contain a leak until it can be identified and resolved.

We will have a new comparison table for you early next week.